

Declaration of Stacey Reeves

I, Stacey Reeves, do hereby state that the following facts are true and correct to the best of my current knowledge, information and belief:

1. I am the Vice President of Operations and Sales of Michael D. Lansky, LLC dba Avid Telecom, LLC (“Avid Telecom”).

2. Among my responsibilities is to interact with the Industry Traceback Group and others regarding traceback issues.

3. Although David Frankel (“Frankel”) has no authority to issue tracebacks, on numerous occasions I interacted directly with Frankel regarding allegations that he had received illegal robocalls that were transited by Avid Telecom (among other carriers).

4. On information and belief, each of these calls were delivered to what is known as a “honeypot.” A “honeypot” is a telephone number that is acquired for the sole purpose of receiving robocalls, legal or otherwise.

5. I believe that Frankel has acquired tens of thousands of telephone numbers across the United States for this sole purpose.

6. I believe that each of these telephone numbers is associated with and monitored by the ZipDX, LLC (“ZipDX”) RRAPTOR software.

7. It is my understanding that each of the calls received by these telephone numbers is recorded.

8. It is my belief that ZipDX does not advise the calling party that the call is being recorded. In fact, the manner in which the call is answered appears intended to deceive the caller into believing that the call is being answered live.

9. I believe that data obtained through the RRAPTOR software, included the recorded text, is shared with third parties via interstate wire.

10. On March 7, 2022, I received an email from Frankel inquiring about several calls that he had received at a “honeypot” telephone number that was associated with a California area code. A true and correct copy of that email is attached as Exhibit A hereto. The email indicated that the call had been recorded and a transcript of the call was provided. The transcript of the call does not include any statement that the call is being recorded or a request for the consent of the calling party to the recording. No consent was provided.

11. I believe that third parties, including state Attorneys General have access to the data that Frankel has placed into the Industry Traceback Group database, including data placed there by Frankel falsely representing that lawful calls were illegal robocalls.

12. On numerous phone calls with Frankel, the subject of the ZipDX RRAPTOR software was discussed. In these calls, Frankel tried hard to convince me that Avid

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Telecom should purchase that software. The messaging was clear: buy the software and you will be “protected” against further claims by ZipDX; fail to buy and lose the “protection.”

13. I am aware that other carriers have been subject to similar “messaging” from Frankel.

14. Avid Telecom decided not to buy the RRAPTOR software.

15. Within several weeks, Frankel commenced a campaign of slander against Avid Telecom, including through the false and defamatory statements he made at the STIR/SHAKEN Enterprise Summit and during the SOMOS Conference Call.

16. All indications are that the timing of and the rationale for Frankel’s sudden new campaign was no coincidence; it was payback for Avid Telecom’s refusal to purchase the RRAPTOR software.

17. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.
Executed on the 10th day of April, 2023.


Stacey Reeves

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Exhibit A

Declaration of Stacey Reeves

I, Stacey Reeves, do hereby state, under penalty of perjury, that the following facts are true and correct to the best of my current knowledge, information and belief:

1. At all times relevant to this action, I served as an independent contractor to Avid Telecom.

2. Among my responsibilities is to interact with the Industry Traceback Group and others regarding the administration of traceback requests.

3. Although Frankel has no authority to issue tracebacks, on numerous occasions I interacted directly with him regarding allegations that he had received illegal robocalls that were allegedly transited by Avid Telecom (among other carriers).

4. On numerous phone calls with Frankel, the subject of the ZipDX RRAPTOR software was discussed. In these calls, Frankel tried to convince me that Avid Telecom should purchase that software. The messaging clearly gave the impression that buying the software “protected” you against further claims of illegal robocalling by ZipDX; fail to buy the software and lose the “protection.”

5. I am aware that other carriers have been subject to similar and stronger “messaging” from Frankel.

6. Prior to the STIR/SHAKEN Enterprise Summit and the SOMOS Conference Call Avid Telecom had not purchased RRAPTOR software.

7. Within several weeks, Frankel commenced a campaign of slander against Avid Telecom, including through the false and defamatory statements he made at the STIR/SHAKEN Enterprise Summit and during the SOMOS Conference Call that were predicated on data that was allegedly taken from the RRAPTOR software. Threat made; threat implemented.

8. I believe that the timing of Frankel's efforts to convince me that Avid Telecom should purchase the RRAPTOR software, its failure to do so and Frankel's campaign to defame and to destroy Avid Telecom was no coincidence; it was payback for Avid Telecom's failure to cave to Frankel's protection scheme by purchasing the RRAPTOR software.

Dated: September 25, 2023


Stacey Reeves

Declaration of Stacey Reeves

I, Stacey Reeves, do hereby state, under penalty of perjury, that the following facts are true and correct to the best of my current knowledge, information, and belief:

1. At all times relevant to this action, I served as an independent contractor to Avid Telecom.
2. Among my responsibilities is to interact with the Industry Traceback Group and David Frankel regarding the administration of traceback requests.
3. Although Frankel has no authority to issue tracebacks, on numerous occasions I interacted directly with him regarding allegations that he had received illegal robocalls that were allegedly transited by Avid Telecom (among other carriers).
4. On more than one occasion, Frankel sent me emails that set forth claims of illegal robocalling. While I patiently attempted to work with him to avoid the feared consequences of non-compliance with his demands, on no occasion did I ever suggest or admit that any call transited by Avid Telecom was an illegal robocall.
5. As set forth in my previous Declaration, on numerous phone calls with Frankel, the subject of the ZipDX RRAPTOR software was discussed. In these calls, Frankel tried to convince me that Avid Telecom should purchase that software. The messaging clearly gave the impression that buying the software “protected” you against further claims of illegal robocalling by ZipDX; fail to buy the software and lose the “protection.”
6. I am aware that Frankel is attempting to characterize my offers to investigate the issues that he raised and to address his concerns to our customers as an admission that Avid Telecom knew that it was transiting illegal robocalls. They were no such thing. I never admitted to Frankel that Avid Telecom was transiting illegal robocalls.
7. Prior to the STIR/SHAKEN Enterprise Summit and the SOMOS Conference Call Avid Telecom had not purchased RRAPTOR software. Avid Telecom viewed the false accusations made by Frankel at the STIR/SHAKEN Enterprise Summit and the SOMOS Conference Call as punishment for its refusal to purchase.

Dated: October 27, 2023


Stacey Reeves